

Hon. Ricardo Martinez

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

RUSSEL H. DAWSON, PERSONAL  
REPRESENTATIVE OF THE ESTATE  
OF DAMARIS RODRIGUEZ;  
REYNALDO GIL; JOSE MARTE;  
A.R.; I.R.; S.R.; D.R.,

Plaintiffs,

vs.

SOUTH CORRECTIONAL ENTITY  
("SCORE"), et al.,

Defendants.

NO. 2:19-cv-01987-RSM

STIPULATION AND AGREED  
ORDER DISMISSING  
INDIVIDUAL DEFENDANTS

STIPULATION

The parties, by and through counsel, hereby stipulate as follows:

1. The following individual defendants are dismissed with prejudice and without costs or fees as to any and all of Plaintiffs' claims:

- a. Brandon Heath;
- b. Pedro Santos;
- c. Ethan Glover, and
- d. Colminton Allen.

STIPULATED AND AGREED ORDER DISMISSING  
INDIVIDUAL DEFENDANTS – 1

Cause No.: 2:19-cv-01987-RSM

LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.  
ATTORNEYS AT LAW  
2674 R.W. JOHNSON RD. TUMWATER, WA 98512  
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2. These individuals will be treated as parties solely for purposes of the Rules of Evidence and Civil Rules applicable to depositions.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD this 26<sup>th</sup> day of July, 2021.

KRUTCH LINDELL BINGHAM JONES, P.S.

*s/ J. Nathan Bingham*

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J. Nathan Bingham, WSBA #46325  
Jeffrey C. Jones, WSBA #7670  
James T. Anderson, WSBA #40494  
Attorneys for Plaintiffs

LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.

*s/ John E. Justice*

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John E. Justice, WSBA No. 23042  
Attorney for SCORE Defendants

KEATING, BUCKLIN & MCCORMACK, INC., P.S.

*s/ Stewart A. Estes*

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Stewart A. Estes, WSBA #15535  
Attorneys for SCORE Defendants

WILLIAMS KASTNER

*s/ Heidi L. Mandt*

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Heidi L. Mandt, WSBA #26880  
Attorneys for NaphCare, Inc. Defendant

KING COUNTY PROSECUTING ATTORNEY

*s/ Raam Wong*

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Daniel Kinerk, WSBA No. 13537  
Raam Wong, WSBA No. 45486  
Senior Deputy Prosecuting Attorneys  
Attorneys for King County Defendants

**STIPULATED AND AGREED ORDER DISMISSING  
INDIVIDUAL DEFENDANTS – 2**

**Cause No.: 2:19-cv-01987-RSM**

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PURSUANT TO ABOVE STIPULATION, IT IS ORDERED as follows:

1. The following individual defendants are hereby dismissed with prejudice and without costs or fees as to any and all of Plaintiffs' claims:

- a. Brandon Heath;
- b. Pedro Santos;
- c. Ethan Glover, and
- d. Colminton Allen.

2. The above individuals will be treated as parties solely for purposes of the Rules of Evidence and Civil Rules applicable to depositions.

DATED this 27<sup>th</sup> day of July, 2021.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE